



ACF INDUSTRIES

INCORPORATED

SHIPPERS CAR LINE DIVISION

620 NORTH SECOND STREET, ST. LOUIS, MISSOURI 63101 • (314) 723-9600

EPA Region 5 Records Ctr.



355979

March 12, 1980

Mr. Thomas E. Cavanagh, Jr.
Manager
Land Permit Section
Division of Land/Noise Pollution Control
2200 Churchill Road
Springfield, IL 62706

RECEIVED

MAR 14 1980

E.P.A. — D.L.P.C.
STATE OF ILLINOIS

Dear Mr. Cavanagh:

RE: Application for Permit to Develop a Solid Waste Management Site

As you are aware, Shippers Car Line Division of ACF Industries, Inc. is in the process of eliminating the existing waste treatment lagoons at the East St. Louis, Illinois facility. The present system will then be replaced with a system consisting of:

1. A primary equalization, skimming and settling tank,
2. A chemical treatment system,
3. Effluent and sludge tanks, and
4. Sewer connection to the City of East St. Louis, Illinois.

All waste products from the car cleaning portion of the railroad car repair operation will be disposed of off site.

The application for permit to construct the first phase of this system was submitted to the IEPA Division of Water Pollution Control on January 29, 1980. This phase is scheduled for completion during mid 1980 -- reference Exhibit G of the attached application for a schedule of construction.

Although the Shippers Car Line operation located in East St. Louis is neither a disposal facility nor in the business of waste management, your office has requested the attached information as a matter of record in accordance with Chapter 7 of the Illinois Pollution Control Board Rules and Regulations. Pursuant to this request, please find attached two signed copies of our Application for Permit to Develop a Solid Waste Management Site.

Please contact me should you have any questions concerning this matter.

Notification Sent
Per I. E. P. A. Act §39 (c)

MAR 17 1980

CLM/rkc/D5

DL/NPC
Attachments (2)

Sincerely,

C. L. Metcalf
Environmental Specialist

Mr. Thomas E. Cavanagh, Jr.
March 12, 1980
Page Two

cc: J. E. Tyler - SCL/East St. Louis (with att.)

Mr. Kenneth G. Mensing (with att.)
Southern Region Manager
Land Field Operation Section
Division of Land/Noise Pollution Control
Illinois Environmental Protection Agency
115A West Main Street
Collinsville, IL 62234

Illinois Environmental Protection Agency

2200 Churchill Road, Springfield, Illinois 62706



APPLICATION FOR PERMIT TO DEVELOP A SOLID WASTE MANAGEMENT SITE

Waste
Check if
Applicable

☐ Storage
☐ Transfer
☐ Processing
☐ Recovery
☐ Incineration
☒ Other

In Accordance With The Environmental Protection Act

All information submitted as part of the Application is available to the public except when specifically designated by the Applicant to be treated confidentially as regarding a trade secret or secret process in accordance with Section 7(a) of the Environmental Protection Act.

APPLICATION MUST BE SUBMITTED IN DUPLICATE

RECEIVED

MAR 14 1980

PART I - APPLICANT INFORMATION

E.P.A. — D.L.P.C.
STATE OF ILLINOIS

A. Site Identification

1. Name of Applicant ACF INDUSTRIES, INC.
SHIPPERS CAR LINE DIVISION
(Person responsible for operation)

2. Address of Applicant 620 N. Second Street
(Street, P.O. Box, or R. R. #)

St. Charles, Missouri 63301
City State Zip Code

Telephone: (314) 946-7900
(Area Code) (Number)

3. Name of Land Owner As Above
(If same as above, so indicate)

4. Address of Land Owner As Above
(Street, P.O. Box, or R. R. #)

City State Zip Code

5. Name of Site Shippers Car Line Division/East St. Louis

6. Address of Site 100 Trendley Avenue
(Street, P.O. Box, or R. R. #)

East St. Louis, Illinois 62201
City State Zip Code

St. Clair County 2N Township

7. Land ownership (Check Applicable Boxes)

(X) Presently Owned by Applicant () To be Leased by Applicant For Years

() To Be Purchased by Applicant () Years of Lease Remaining:

Termination date of lease

Operated by: Ill. Corporation () Partnership () Government ()

Individual () Other (X) New Jersey Corporation

B. SITE BACKGROUND (Check Applicable Box or Boxes)

8. (X) This is an existing operation begun July (mo.) 1925 (yr.)

() this is a proposed operation.

() This is a proposed extension of an existing adjacent operation:

Illinois E.P.A. Permit No. :

No Illinois E.P.A. Permit.

PART II - LOCATION INFORMATION

A. ZONING AND LOCAL REQUIREMENTS

9. Present zoning classification of site M2 Heavy Manufacturing and Industrial District

10. Does present zoning of site allow the proposed usage?

(X) Yes () No.

11. Restrictions (if any) Refer to Exhibit A

12. Check applicable boxes which describe the use of adjacent properties surrounding site.

	Residential	Commercial	Industrial	Agricultural	Others*
a. North	()	()	(X)	()	()
b. East	()	()	(X)	()	()
c. South	()	()	(X)	()	()
d. West	()	()	(X)	()	()

*SPECIFY USE CLASSIFICATION M2 (heavy manufacturing and industrial district)

13. a. Are there any permits, operational requirements, licenses, or other requirements or restrictions by any municipality, planning commission, county, county health department, state agency, or other governing body?
(X) Yes () No If yes, List below. _____
IEPA Air Permit; ID #163045ABZ
IEPA Water Pollution Control Permit; application submitted
- b. Have these requirements, licenses or restrictions been approved by the agency or governing body having jurisdiction? Note: The Water Pollution Control Permit is (X) Yes () No presently being reviewed.
- c. If the answer to (b) is yes, include photocopies of supporting documents.

B. LOCATION

Reference Exhibit B

14. Attach a copy of the United States Geologic Survey (U.S.G.S.) topographic quadrangle map of the area which contains the site. (7.5 minute quadrangle, if published).

Quadrangle Map Provided: Cahokia _____
Name Date

15. a. Outline on the U.S.G.S. topographic quadrangle map the location and extent of the site.
- b. Provide a legal description of the site. (Typewritten on attached sheet.) Reference Exhibit D

25 Acres in S 1/2 Quarter, NE 1/4 Quarter, SW 1/4 Quarter,
of Section 11, Township 2N,
Range 10W, 3 P.M.

16. General characteristic: (Flood Plain, Hillside, Field, Strip Mine, Quarry, Gully, Gravel Pit, Swamp, etc.)

Briefly describe: Protected by existing levee

Data: 100 year = 426.2; 50 year = 424.5;

10 year = 416.4

17. Plot the following information on the U.S.G.S. quadrangle topographic map, if within the site or adjacent to the outer perimeter of facility: The following items are not within the site or adjacent to the outer perimeter
- Wells (domestic, industrial, etc.)
 - Public water sources (wells, stream, etc.)
 - Residences or residential areas, commercial facilities, sewage treatment facilities, industries, institutions, etc.
 - Other treatment facilities not shown on topographic map such as diverted steams, strip mines, ponds, etc.

If scale of quadrangle map is not sufficient, show the above items on a separate topographic map (See Part IV - A - 23).

PART III - SITE CHARACTERISTICS

To Be Completed If Land Disposal Of Waste On Site Is Requested

NOT APPLICABLE
Land disposal on site
is not requested.

A. GEOLOGY - HYDROLOGY

NOTE: The instructions for this Part of the Application should be read carefully prior to initiating the data-gathering program for the site.

Provide subsurface information in comprehensive detail, sufficient to allow thorough evaluation of the hydrologic and geologic conditions beneath and surrounding the site. This data must fully describe the hydrogeologic interrelationships of the landfill facility, local ground waters, and surface waters. All information requested in sections 18 through 22 should be integrated and presented as a detailed hydrogeologic report.

B. GEOLOGY

GENERAL GEOLOGIC SETTING

18. Provide a brief description of the general geography of the region in which the site is located, and a summary of the hydrogeologic conditions typical of that portion of Illinois.

TYPE AND EXTENT OF SUBSURFACE MATERIALS

19. Provide a complete log (description) of each boring made during the exploratory program, and include all other pertinent data so obtained.
20. Include the following information regarding the bedrock, if encountered during the boring program:
 - a. Depth(s) to bedrock.
 - b. Lithology (physical character) and hydrologic characteristics of the bedrock formation.
 - c. Name and age of the formations encountered during the boring operation and (or) which crop out on or adjacent to the site.

C. MATERIALS CLASSIFICATION AND ANALYSIS

21. Provide the following information for samples taken during the boring operation:
 - a. textural classification (U.S.D.A. system)
 - b. particle size distribution curves for representative samples
 - c. coefficient of permeability - based on field and (or) laboratory determinations
 - d. ion-exchange capacity and ability to absorb and "fix" heavy metal ions

D. HYDROLOGY

22. Provide the following information regarding the hydrologic flow system in the area of the site:
 - a. Depth to water in boreholes at time of boring completion and periodic measurements until the water level has stabilized.
 - b. Rate(s) and direction(s) of ground-water movement.
 - c. A narrative description (with diagrams) of the design and installation procedures for all piezometers installed at the site. This shall include both water-level measuring piezometers and those installed for permanent use as water-quality monitoring points.
 - d. An analysis of the background ground-water quality, as per those constituents listed in the Instructions. Attach a copy of the laboratory report.
 - e. An outline of the procedures, devices, and personnel to be employed for the collection of periodic ground-water samples from the monitoring point(s) installed at the site.

PART IV - CONSTRUCTION PLANS
AND SPECIFICATIONS

A. SITE DEVELOPMENT PLAN

23. Provide a detailed topographic map of the existing site (Scale 1" = 200' or larger) showing 5-foot contour intervals on sites (or portions thereof) where the relief exceeds 20 feet, and 2-foot contour intervals on sites (or portions thereof) having less than 20 feet of relief. This map should show all buildings, ponds, streams, wooded areas, bedrock outcrops, underground and overhead utilities, roads, fences, culverts, drainage ditches, drain tiles, easements, streets, any other item of significance, including legal boundaries.
- Refer to
Exhibit E

Show the location and elevation of borings as described in Part III - 19, 20.

24. Provide a separate map, at the same scale as that above, of the developed site showing the following:
- Refer to
Exhibit F

- a. All changes in topography dictated by design and operational factors.
- b. All surface features (as specified in IV - A - 23) both unaltered and modified, and installed as part of the facility. This shall include all new construction with location plans for berms, dikes, dams, earth barriers, surface drainage ditches, drainage devices, (culverts, tiles), fencing, access roads, entrance(s), utilities, buildings, sanitary facilities, monitoring well(s), streams, ponds, mines, and any other special construction as may be required to comply with the provisions of the Rules and Regulations.
- c. Earth barriers, berms, dikes and other barriers, including essential dimensions of each.

25. Provide a topographic map of the closed and covered site showing final contours, with an interval of 5 feet if relief is greater than 20 feet, and intervals of 2 feet if relief is less than 20 feet.
- Not
Applicable

26. Provide plan views (Scale 1" = 200') and cross sections of the leachate collection and treatment system, if utilized, including the following information:
- Not
Applicable

- a. Type, location and construction of subsurface collection system, and all attendant devices.
- b. Location, dimensions, volume, and surface elevation of treatment lagoon(s), if used.
- c. Detailed written narrative of the method and processes of the treatment system, and program for monitoring the performance and effectiveness of the treatment system.
- d. Discharge point(s) of effluent.

B. SCHEDULE OF CONSTRUCTION

27. Attach a typewritten narrative supplemented by indications on the plans of the sequence of areas to be developed. Estimate the date of beginning and ending of each phase of construction and operation. Refer to Exhibit G

C. CONSTRUCTION REQUIREMENTS

Refer to Exhibit H

28. Attach a typewritten narrative supplemented by indications on the plans of provisions to be made for:
- a. Prevention of surface-water pollution
 - b. Control of gas migration.
 - c. Elimination of flood hazard, if any.
 - d. Employee facilities.
 - f. Measuring quantity of waste delivered to the site.

PART V - OPERATING PLAN

A. SOURCE AND VOLUME

29. Indicate the estimated quantity of each of the following sources and types of waste the facility will handle during each day of operations; each week of operation; each year of operation. Specify any additional information regarding refuse source and quantity.

<u>SOURCE</u>	<u>TYPE</u>	<u>DAILY QUAN.</u>	<u>WEEKLY QUAN.</u>	<u>ANNUAL QUAN.</u>
a. Residential	_____	_____	_____	_____
b. Commercial	_____	_____	_____	_____
c. Industrial	X	8,000 gal.	40,000 gal.	2,080,000 gal.
d. Agricultural	_____	_____	_____	_____
e. Other (Describe)	_____	The above figures are based on the estimated average flow through the Waste Treatment System.		

B. OPERATING REQUIREMENTS

30. Attach a typewritten description of provisions for: Refer to Exhibit I
- a. Personnel for supervision and operation
 - b. Traffic control

- c. Designation of unloading area
- d. Dust control
- e. Odor control
- f. Management of surface water
- g. Erosion control
- h. Monitoring program for gas
- i. Reuse and recycling operations

31. Provide a list of equipment to be used for the operation:

ITEMS	MODEL NUMBER	NO. OF UNITS IN OPERATION	DESCRIPTION
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Please refer to the construction specification on file with the Division of Water Pollution Control - IEPA.

P A R T V I - N O T I C E / L A N D U S E

32. In order that notice of intent be sent to those affected by this application, you shall provide these names and addresses to the Agency: Refer to Exhibit J
- a) State's Attorney of the county in which the site is located.
 - b) Chairman of the County Board of the county in which the site is located.
 - c) Each member of the General Assembly from the Legislative district in which the site is located. (Three Representatives, One Senator)

- d) The clerk of each municipality, any portion of which is within three miles of the site.
- e) Adjacent landowners to the proposed site.
- f) Local zoning and planning agencies.

33. Provide the following documentary evidence sufficient to show:

Refer to
Exhibit K

- a) That the facility is located so as to minimize scenic blight, and to avoid damage to archaeological and/or historic sites and areas of significant natural beauty;
- b) That the facility is located so as to avoid any hazards to public health and safety and to minimize any offenses to the senses of persons residing, working, traveling, and/or in any way spending periods of time in the immediate vicinity. Immediate vicinity is here defined to mean a one-mile radius zone adjacent to the boundary of the site;
- c) Taking into consideration the character of the area involved, including the character of surrounding land uses and the trend of development, as well as local comprehensive plans and zoning ordinances, that the facility is located so as to minimize incompatibility with the character of the surrounding area.
- d) That the facility is located so as to avoid causing substantial depreciation of nearby property (taking into consideration, where possible, any mitigation caused by the short proposed life of the site and end use);
- e) That any detriments caused by removal of the site from its former use are out-weighted by the need in the area for a landfill at this location;
- f) That the facility is located so as to avoid a continued adverse effect on existing air and water quality; and
- g) Taking into consideration geological and hydrological factors, the location of the site in relating to sources of solid waste and accessibility to transportation modes, and the technical feasibility and economic reasonableness of disposing of solid waste at the proposed location, that the facility is suited for its intended use.
- h) That access roads and bridges are not limited to preclude necessary vehicular traffic (i.e. proposed size and weight limits).

I hereby affirm that all information contained in this Application is true and accurate to the best of my knowledge and belief.

Signature of Applicant: B.A. Gustafsen, Vice Pres. March 12, 1980
ACF Industries Inc. Date

Attest: January Gullerud 3/12/80
Date

Signature of Engineer: David R. Huthless 3/7/80
PRESIDENT
INGRAM-KIETHLINE-WEHMEYER, INC.

Illinois Reg. No: 62-26230

Attest: David R. Huthless 3/7/80
Date

Signature of Landowner(s): B.A. Gustafsen, Vice Pres. March 12, 1980
ACF Industries, Inc. Date

Attest: January Gullerud 3/12/80
Date

Engineer (Seal)

Signature of other person, technical and non-technical, who has supplied data contained in the submittal.

David R. Huthless 3/7/80
Signature Date

Executive Vice President

E-16301 Missouri, INGRAM-KIETHLINE-WEHMEYER, INC.

Reg. No., Position, Title, Etc.

Engineer (Seal)

Signature

Date

Reg. No., Position, Title, Etc.

(Seal)

SAS:bls/7055A/sp

EXHIBIT A
(Item 11)



SCHEDULE II (Cont'd.)

9. Building Coverage (Maximum)	75 per cent by all structures.
10. Other Required Conditions	<p>a) Any use which is not conducted wholly within a completely enclosed building shall be not less than 200 feet distant from any R-District, unless a greater distance is otherwise required elsewhere.</p> <p>b) All permitted, accessory and special uses, except for offices and retail-commercial uses, shall be subject to review in accordance with the Performance Standards Procedure.</p>

TYPE OF REGULATION

M-2, HEAVY MANUFACTURING AND
INDUSTRIAL DISTRICTS

- | | |
|-----------------------------|---|
| 1. Principal Permitted Uses | <p>a) Any manufacturing, research, wholesale or storage uses permitted in the M-1 District and any retail or commercial uses, such as restaurants and service stations which are appropriate and necessary to serve the M-2 District.</p> <p>b) Railroad yards, <u>repair shops</u> and roundhouses, terminals, freight transfer facilities and barge loading and unloading facilities.</p> <p>c) Grain elevators and bulk storage of petroleum and similar products.</p> <p>d) Metal fabricating, including automobile and metal appliance manufacturing and assembly, structural steel shops, machine shops, forges and foundries.</p> <p>e) Brewing or distilling of liquors or perfume manufacture.</p> <p>f) Brick, glass, pottery manufacturing, stone or ceramics, monument works.</p> <p>g) Gas manufacture and storage.</p> <p>h) Quarrying including rock crushing, grinding, polishing or cutting.</p> <p>i) Any of the following manufacturing uses including primary production of the following products from raw materials, provided that such uses are located not less than 200 feet from the nearest R-District:</p> <p>1) Asphalt, charcoal, fuel briquettes;</p> <p>2) Aniline dyes, ammonia, carbides, caustic soda, cellulose, carbon black, creosote, hydrogen and oxygen, industrial alcohol,</p> |
|-----------------------------|---|

SCHEDULE II (Cont'd.)

	<p>nitrates of an explosive nature, potash, plastic materials, and synthetic resins, pyroxylin, rayon yarn;</p> <p>3) Coal, coke and tar products except as otherwise provided herein;</p> <p>4) Turpentine, mastics, paint, plastics;</p> <p>5) Rubber; soaps including fat rendering;</p> <p>6) Flour mills, lime kilns, the manufacture or processing of cement.</p> <p>j) Slaughter houses, meat packing operations.</p> <p>k) Signs as permitted in Article 8.</p>
2. Accessory Uses	Accessory uses and buildings customarily appurtenant to a Principal Permitted Use such as incidental storage facilities, and required and permitted off-street parking and loading facilities appurtenant only to a permitted use on the premises.
3. Special Uses	<p>a) Any special use permitted in the M-1 District.</p> <p>b) Storage of fire works or explosives, only where incidental to a permitted use.</p> <p>c) Automobile salvage and wrecking operations, outdoor storage and junk yards subject to the Performance Standards Procedure; if located not less than two hundred (200) feet from the nearest R-District and provided that all operations are conducted within a solid wall or tight board fence not less than eight (8) feet high.</p> <p>d) Any other use which is determined by the Board to be of the same general character as the above permitted uses which will not be injurious to the district.</p>
4. Height (Maximum)	No limit on height so long as the structure is within an angle of 60 degrees from the center of the street right of way on which it abuts.
5. Lot Area (Minimum)	50,000 square feet for any permitted use.
6. Lot Frontage (Minimum)	100 feet.
7. Lot Depth (Minimum)	200 feet.
8. Yards (Minimum)	
a) Front Yard	a) 25 feet, except when abutting an R-District, then 50 feet.
b) Side Yard	b) None, except when abutting an R-District, then 50 feet from such R-District.
c) Rear Yard	c) 25 feet, except when abutting any R-District, then 50 feet.

SCHEDULE II (Cont'd.)

9. Building Coverage (Maximum)	75 per cent by all structures.
10. Other Required Conditions	<p>a) Any use which is not conducted wholly within a completely enclosed building shall be not less than 200 feet distant from any R-District, unless a greater distance is otherwise required elsewhere.</p> <p>b) All permitted, accessory and special uses, except for offices and retail-commercial uses, shall be subject to review in accordance with the Performance Standards Procedure.</p> <p>d) Any building over four stories in height shall have a maximum floor area not exceeding 2-1/2 times the area of the zone lot upon which it is proposed.</p>

- NOTES: a) Off-street parking and loading shall be provided in accordance with Article 7.
- b) The regulations set forth in this schedule are basic to the regulation of each district; additional regulation and modifications of the regulations in this schedule are set forth in the text of this Ordinance.
- c) Maximum building coverage is defined as the maximum percentage of a zone lot which may be occupied by all principal and accessory buildings and structures.

Illinois Environmental Protection Agency

EXHIBIT B
(Item 13c)

ward to J. Libera



Road, Springfield, Illinois 62706

217/782-2113

Permit Expiration Date: September 30, 1983

Application No.: 03020341

I.D. No.: 163045ABZ SHP C LN D

Received: September 19, 1978

Operation of: Shippers Car Line Division Plant

Location: 100 Trendley Avenue, East St. Louis, St. Clair County

October 5, 1978

ACF Industries, Inc.
750 Third Avenue
New York, New York 10017

Attention: J. S. Carlson

Gentlemen:

Permit is hereby granted to operate the above-referenced equipment.

This permit is subject to the following conditions:

1. Standard conditions attached hereto and incorporated herein by reference.

Very truly yours,

M. Paul Schmierbach, P.E.
Manager, Permit Section
Division of Air Pollution Control

MPS:JDC:lg/4872a/9



STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF AIR POLLUTION CONTROL
2200 CHURCHILL ROAD
SPRINGFIELD, ILLINOIS 62706

STANDARD CONDITIONS
FOR
OPERATING PERMITS

1. The issuance of an operating permit by the Agency does not release the permittee from compliance with other applicable statutes of the State of Illinois or with applicable local laws, regulations or ordinances.
2. The Agency has granted this permit based upon the information submitted by the permittee in his permit application. Any misinformation, false statement or misrepresentation in the permittee's application shall be grounds for revocation under Rule 103(f), Chapter 2, Part 1 of the Illinois Pollution Control Board Rules and Regulations.
3. The permittee shall not authorize, cause, direct or allow any modification, as defined in Rule 101, Chapter 2, Part 1, of the Illinois Pollution Control Board Rules and Regulations, of equipment, operations or practices which are reflected in the permit application as submitted unless a new application or request for revision of existing application is filed with the Agency at least ninety (90) days prior to the time of such modification and unless a new permit or revision of existing permit is granted for such modification.
4. At any time during normal working and/or operating hours, any agent of the Environmental Protection Agency shall have the right and authority to inspect such equipment and operation as described by the referenced operating permit application. Permittee agrees to allow such inspections. This authority:
 - (a) shall not in any manner affect the title to the premises upon which the equipment is located.
 - (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of, the design, installation, maintenance, or operation of the proposed equipment.
 - (c) in no manner implies or suggests that the Environmental Protection Agency (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the proposed equipment.
5. The equipment covered by this permit shall be operated in such a manner that the disposal of air contaminants collected by the equipment shall not cause a violation of the Environmental Protection Act or Regulations promulgated thereunder.
6. The permittee shall maintain the equipment in such a manner that the performance of such equipment shall not cause a violation of the Environmental Protection Act or Regulations promulgated thereunder.
7. The permittee shall maintain a maintenance record on the premises for each item of air pollution control equipment. This record shall be available to any agent of the Environmental Protection Agency at any time during normal working and/or operating hours. This record shall show, as a minimum, the following:
 - (a) Date of performance of, and nature of, preventive maintenance.
 - (b) Date of any malfunction or breakdown and the nature of repairs to, or corrective measures performed to maintain the performance of, the equipment.
8. The permittee shall submit annually, beginning one year from the date of this operating permit, an "Annual Emission Report," form APC-200, as required by Rule 107 of the PCB Regs., Chapter 2, Part 1.
(NOTE: If the permittee has other operating permits for this facility, he may submit annually the "Annual Emission Report," form APC-208, for all such permits in one submission.)
9. If the permit application contains information which has been accepted as confidential by the Agency, the Agency will return a copy of the application to the permittee. The permittee shall maintain on the premises this copy of the application intact and without change. The permittee shall make available this copy of the application for the perusal of any agent of the Environmental Protection Agency at any time during normal working and/or operating hours.
10. If the referenced permit application contains a Compliance Program and Project Completion Schedule (APC-202), the permittee shall submit a Project Completion Report (APC-271) within thirty (30) days of any date specified in the Compliance Program and Project Completion Schedule, or at six month intervals, whichever ever is more frequent.
11. If the referenced permit contains permission to operate in excess of applicable emission standards during startup, the permittee shall keep a record of each startup, including information as to the length of time that such operation exceeded applicable standards and limitations, and a detailed explanation of why such startup was necessary.
12. If the referenced permit contains permission to operate in excess of applicable emission standards during malfunctions or breakdowns, the permittee shall immediately notify the Agency's regional Field Operations Section office by telegram upon occurrence of malfunction or breakdown, and comply with all directives of the regional office with respect to the incident. (See map on reverse side)

The permittee shall maintain records of such malfunctions or breakdowns. These records shall include: a full and detailed explanation of why such breakdown occurred; the length of time during which operation continued under conditions of malfunction or breakdown; the measures the permittee used to reduce the length of time of such operation; and the steps the permittee will take to prevent future similar malfunctions or breakdowns. This record shall be available to any agent of the Environmental Protection Agency at any time during normal working and/or operating hours.

The permittee shall not continue operation during malfunction or breakdown beyond such time as is necessary to prevent injury to persons or severe damage to equipment or to provide essential services.

DEPARTMENT OF REGISTRATION AND EDUCATION
GEOLOGICAL SURVEY DIVISION

ILLINOIS — MISSOURI
7.5 MINUTE SERIES (TOPOGRAPHIC)

EXHIBIT C
(Item 14)

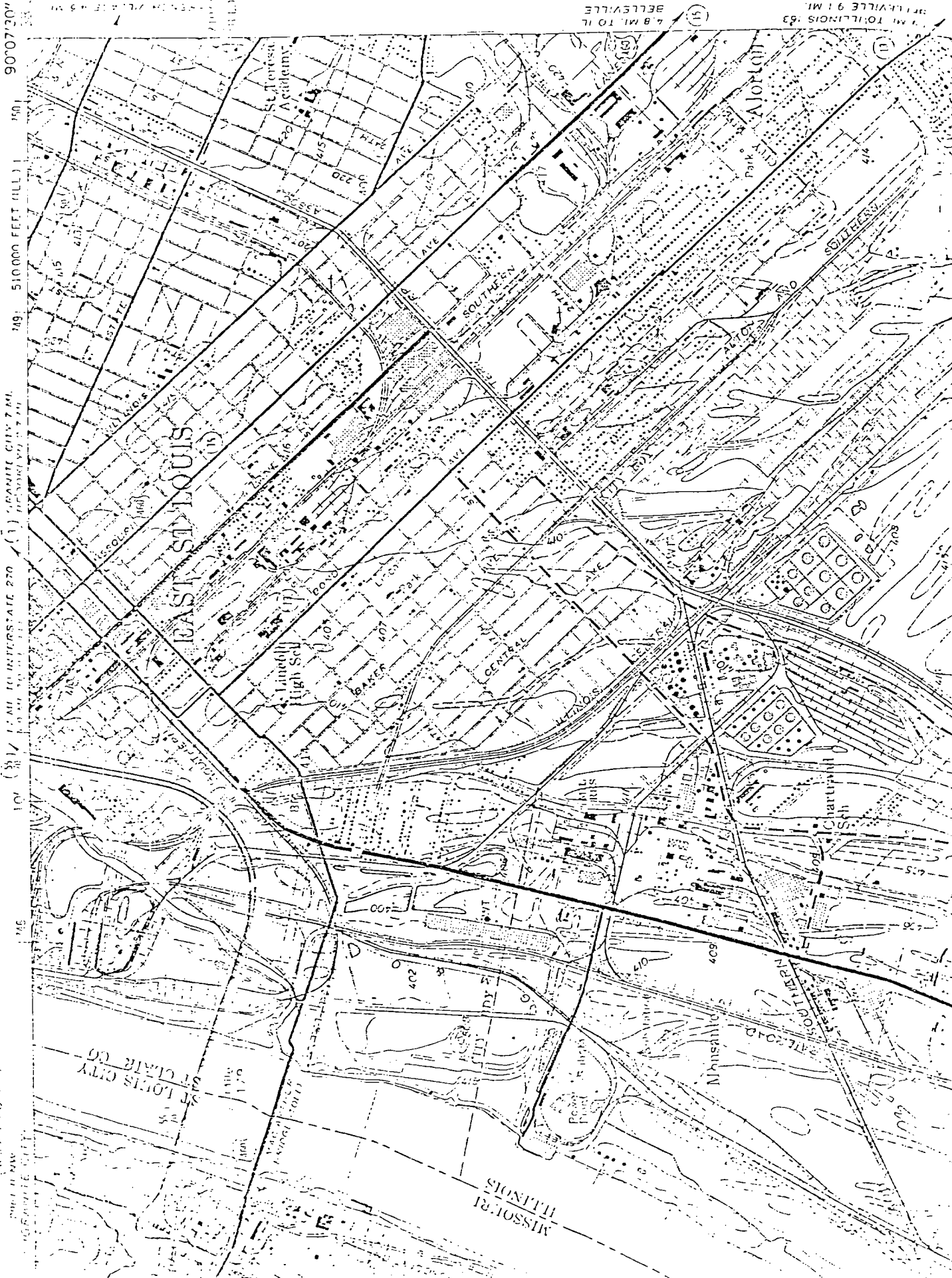


Exhibit D
(Item 15b)

LEGAL DESCRIPTION

Part of "DIVISION OF VACANT FERRY LANDS, EAST ST. LOUIS, ILLS."; reference being had to the plat thereof recorded in the Recorder's Office of St. Clair County, Illinois, in Book of Plats "B" on pages 28 and 29, more particularly described as follows, to-wit:

Beginning at the intersection of the East line of Front Street with the South line of Trendley Avenue; thence South 89 degrees 29 minutes East from said beginning point along the South line of Trendley Avenue, a distance of 960.49 feet; thence East continuing along the South line of Trendley Avenue, a distance of 161.80 feet to an intersection with a curve; thence Southerly along a curve to the right having a radius of 1,424.41 feet, a distance of 766.73 feet; thence South 16 degrees 10 minutes West, a distance of 163.64 feet to an intersection with a curve; thence Westerly along a curve to the left having a radius of 500.75 feet, a distance of 74.53 feet to a point of tangent; thence North 65 degrees 43 minutes West, a distance of 46.64 feet to a point of curve; thence Westerly along a curve to the left having a radius of 852.22 feet, a distance of 257.07 feet to a point of tangent; thence North 83 degrees 00 minutes West, a distance of 213.48 feet to a point of curve; thence Westerly along a curve to the right having a radius of 647.36 feet, a distance of 126.64 feet to a point of tangent; thence North 71 degrees 47 minutes 30 seconds West, a distance of 364.16 feet to a point of curve; thence Westerly along a curve to the right having a radius of 1,354.23 feet, a distance of 76.42 feet to a point of compound curve; thence Westerly and Northerly along a curve to the right having a radius of 355.89 feet, a distance of 301.30 feet to a point of tangent; thence North 20 degrees 03 minutes West, a distance of 65.91 feet to a point on the East line of Front Street; thence North 0 degrees 34 minutes East along said line, a distance of 290.12 feet to the point of beginning, together with all buildings, railroad tracks and appurtenances thereto and other improvements situated thereon.

EXHIBIT E
(Item 23)

REFER TO ATTACHED TOPOGRAPHIC
MAP BEFORE CONSTRUCTION

EXHIBIT F
(Item 24)

REFER TO ATTACHED TOPOGRAPHIC
MAP AFTER CONSTRUCTION

EXHIBIT G

(Item 27)

SCHEDULE OF CONSTRUCTION

Shippers Car Line will be eliminating the existing waste treatment Lagoons at the East St. Louis Plant. The present system will then be replaced with a system consisting of:

1. A primary equalization, skimming, and settling tank,
2. A chemical treatment system,
3. Effluent and sludge tanks, and
4. Required sampling wells.

Construction will proceed as follows:

Phase I: The first phase of construction will consist of installing:

- a. Primary (concrete) equalization tanks.
- b. Skimming equipment.
- c. A pump station, force main with flow metering and sampling equipment.
- d. Sewer connection to the City of East St. Louis, IL.

This phase is scheduled for completion during mid 1980.

Phase II: The second phase of construction will consist of providing chemical treatment capabilities along with a hypolon lined sludge lagoon. Installation will include:

- a. A batch treatment tank.
- b. A chemical feed building.
- c. An acid tank.
- d. A hypolon lined sludge lagoon.

This second phase is scheduled for completion during late 1980 or early 1981.

Phase III: The third phase is designed basically to provide for a permanent facility. Construction activities during this phase will include:

1. Replacement of the hypolon lined lagoons with concrete effluent and sludge tanks.

This phase is scheduled for completion during 1981.

EXHIBIT H

(Item 28)

Prevention of Surface - Water Pollution.

Shippers Car Line Division/East St. Louis, has implemented a Spill Prevention Control and Countermeasure Plan in accordance with 40CFR, Part 112.

In addition, handling and spill procedures are prescribed for each material.

Control of Gas Migration

Not applicable.

Elimination of Flood Hazard

The facility is protected by an existing levee. No flooding is anticipated.

Employee Facilities

All employees have access to the plant's lockerroom, shop, and office facilities.

Measuring Quantity of Waste

Effluent Discharge

The Waste Treatment System includes a flow metering device which will measure the volume of effluent discharged to the City of East St. Louis.

Sludge Material

Sludge from the Waste Treatment System will be disposed of at an approved disposal facility. Volumes will be determined in accordance with each disposal.

Oil Skimmings

Oil skimmings from the Waste Treatment System will be disposed of and recorded as above.

Drummed Material

Any material which is drummed from the cleaning or Waste Treatment System will be disposed of and recorded as above.

EXHIBIT I
(Item 30)

Personnel for Supervision and Operation

Waste Treatment Supervisor

The Waste Treatment supervisor is responsible for managing the car cleaning and Waste Treatment Operation.

Additional Personnel

A steam rack operator and steam rack helper are employed to operate the car cleaning rack. A waste treatment operator will be employed upon completion of the Waste Treatment System.

Traffic Control

All cars are scheduled for cleaning by management.

Designation of Unloading Area.

All cars which are to be cleaned are handled at the steam rack.

Dust Control

N/A

Odor Control

The Waste Treatment System will provide for odor control through treatment as appropriate.

Management of Surface Water.

N/A

Erosion Control

N/A

Monitoring Program for Gas

All railroad cars to be cleaned are properly tested for pressure and the presence of vapors.

Reuse and Recycling Operations.

Any material which is salvageable will be considered for reclamation and reuse.

EXHIBIT J

(Item 32)

State Attorney
St. Clair County

Clyde Kuehn
County Court House
10 Public Square
Belleville, IL

Chairman of the County Board
St. Clair County

Victor P. Canty
County Court House
10 Public Square
Belleville, IL

Members of the General Assembly
Legislative District 57

Monroe Flinn
Representative

Celeste Stiehl
Representative

Wyvetter H. Younge
Representative

Kenneth Hall
Senator

Municipal Clerks

City of St. Louis

Matthew D. O'Neil
Chief Aldermanic Clerk
City Hall
Room 230
St. Louis, MO 63103

City of East St. Louis

Frank C. Smith
#7 Collinsville Avenue
East St. Louis, IL 62201

Adjacent Landowners

Continental Grain
277 Park Avenue
New York, NY 10017

Illinois Central Gulf
233 N. Michigan
Chicago, IL 60601

Terminal Railroad Association
of St. Louis
906 Olive St.
St. Louis, MO 63101

Local Zoning and Planning Agency

City Planning Department
City of East St. Louis
#7 Collinsville Avenue
East St. Louis, IL 62201

EXHIBIT K

(Item 33)

The Shippers Car Line/East St. Louis facility is located within the railroad yards along the Mississippi River in East St. Louis, Illinois. This location is zoned M2 (heavy manufacturing and industrial) and, as such, the proposed waste treatment improvements located within the plant will not:

1. Cause scenic blight or damage to archaeological and/or historic sites and areas of natural beauty.
2. Cause any hazards to public health or safety.
3. Be incompatible with the character of the surrounding area.
4. Cause depreciation of nearby property.
5. Have an adverse effect on existing air and water quality.

Subsections E, G, and H of Item 33 of the Application for Permit to Develop a Solid Waste Management Site are not applicable.